

## Thursday 6/11/2015 Meeting Summary

### CLA/Industry

Industry asked quite a few questions, several quite pointed, about the effort to regulate pesticide and fungicide use to protect bees. They questioned the validity of bee kill data, specifically lab kill data versus field data reports coming in from the beekeepers. Industry pointed out that it's very challenging to verify the beekeeper/news reports and cautioned that EPA should make sure that they don't jump the gun before clearly establishing cause and effect between chemical pesticide use and bee deaths. Industry also asked questions about how the list of 76 molecules were picked, and were curious about why night-time short residual chemicals were also on the list even though they seemed to have little/no effect on bees. Another point that industry picked up on was the fact that EPA needs to clarify how the project affects growers who raise their own bees, since they would not be under contract and so would they still have to follow the proposed rules which in their current form only affect contracted bees. Lastly industry pointed out that the new risk mitigation proposal may be too rigid and may block the development or use of newer products. Instead they proposed a risk based approach based on application rate vs the hazard only approach that is currently in the project. As a whole, industry seemed to be against the restrictions and believed that growers and beekeepers should have the flexibility to make individual judgments about contracts instead of something as broad as label changes.

### Beekeepers

The beekeepers seemed to generally be supportive and hopeful about the project, but also had their own questions and concerns. One of their chief concerns was the definition of contract, since the majority of beekeepers used just a handshake oral contract instead of formal written contracts and they wanted to know if the language used in the project can be elaborated to make clear that both types of contracts were covered. The beekeepers also had concerns about the state plans, since they believed that the labels are the most important in helping to protect beekeepers and their bees. The beekeepers also mentioned how they wanted a way to release chemical kill data without eliciting an enforcement action, to which the EPA responded that there already is a system for that and the beekeepers admitted that perhaps they just need to better publicize the procedure. However this has its own challenges because the beekeeper associations present admitted that they, despite being the two largest beekeeper associations, represent only roughly 1% of all beekeepers in the nation, and so there are significant difficulties in trying to spread information. The beekeepers also concurred with what industry said about how short residual sprays done at night result in minimal effects on the bees and are acceptable. However they also mentioned concerns about fungicide tank mixes that have are commonly used for more efficient application by growers, but lack bee hazard identification. Lastly, the beekeepers wanted to be more involved with other government agencies as well as the EPA and were extremely eager to offer their help or input.